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Attorney for Roberto Pascacio-Garcia

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

ROBERTO PASCACIO-GARCIA

Defendant:

Case No. 2:19-cr-00305-APG-NJK-1

**Stipulation to Continue Supplement's
Deadline to Motion for
Compassionate Release
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn N. Witt, Assistant Federal Public Defender, counsel for Roberto Pascacio-Garcia, request that the due date for Mr. Pascacio-Garcia Supplement to Motion for Compassionate Release (ECF No. 87), be extended from December 14, 2023, to February 12, 2024; and that the due date for the government's response be extended until March 14, 2023.

This Stipulation is entered into for the following reasons:

1. On November 30, 2023, Mr. Pascacio-Garcia filed a motion seeking an order reducing his sentence or modifying his judgment under the compassionate release statute at 18

1 U.S.C. §§ 3582(c) and 3553(a). ECF No. 87. Mr. Pascacio-Garcia is serving a 10-year sentence,
2 with an estimated release date of May 28, 2027.

3 2. Defense counsel has not had the opportunity to speak with Mr. Pascacio-Garcia
4 to discuss related issues to the motion.

5 3. Defense counsel needs additional time to investigate Mr. Pascacio-Garcia's
6 family medical issues, which are pertinent to the motion.

7 4. This continuance is sought in good faith and not for the purposes of delay.

8 5. For these reasons, Mr. Pascacio-Garcia asks this Court to extend the deadline by
9 60-days for his Supplemental Motion for Order Reducing Sentence or Modifying Judgment
10 under 18 U.S.C. §§ 3582(c) and 3553(a), resetting the deadline for February 12, 2024, and the
11 government's response be extended until March 14, 2024. A proposed order is attached to this
12 stipulation for the Court's convenience.

13 DATED this 5th day of December, 2023.

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15 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

16
17 By /s/ Jacquelyn N. Witt
18 JACQUELYN N. WITT
Assistant Federal Public Defender

By /s/ Jim W. Fang
JIM W. FANG
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
ROBERTO PASCACIO-GARCIA,
Defendant.

Case No. 2:19-cr-00305-APG-NJK-1
ORDER

IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to Extend Deadline for filing his Supplement to Motion for Compassionate Release, that the Defendant's deadline to file his Supplement is extended to February 12, 2024; and that the Government's deadline to file its response is extended to March 14, 2024.

DATED this 8th day of December, 2023.

UNITED STATES DISTRICT JUDGE